BAILEY WASTE DISPOSAL

(ORANGE COUNTY) TEXAS



EPA REGION 6
CONGRESSIONAL

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DISTRICT 02

Updated: February 2006

EPA ID# TXD980864649 Site ID: 0602911

Current Status -

The site's Second Five-Year Review was completed in September 2005 and found that the selected remedy for the Bailey Waste Disposal Site is protective of human health and the environment. The site remedy called for the excavation and off-site disposal of the most problematic waste (i.e., mobile) followed by the on-site consolidation and capping of the remaining contaminated soils. The site's construction activities were completed in August 1997. The site's caps are effective at containing contaminants by preventing infiltration of rainwater and by preventing direct contact with contaminated soils.

To achieve the long-tern effectiveness of the remedy, it will be necessary to maintain the integrity and effectiveness of the final cover in accordance with approved plans, including making repairs to the caps as necessary to correct the effects of erosion, cracking, and animal activity (i.e., burrowing). Institutional controls are in the form of deed notices are being pursued through the Texas Commission on Environmental Quality's Texas Risk Reduction Rules (§ 350.111).

Benefits -

Over 156,000 cubic yards of hazardous materials have been addressed to prevent direct contact and offsite migration. Sensitive wetlands have been protected and made safe for wildlife and recreational activities.

National Priorities Listing (NPL) History —

NPL Proposed Date: October 5, 1984 NPL Final Date: May 20, 1986

Location: The site is located approximately 3 miles southwest of Bridge City in Orange County,

Texas (see Figure 1). The site was originally part of a tidal marsh near where the Neches

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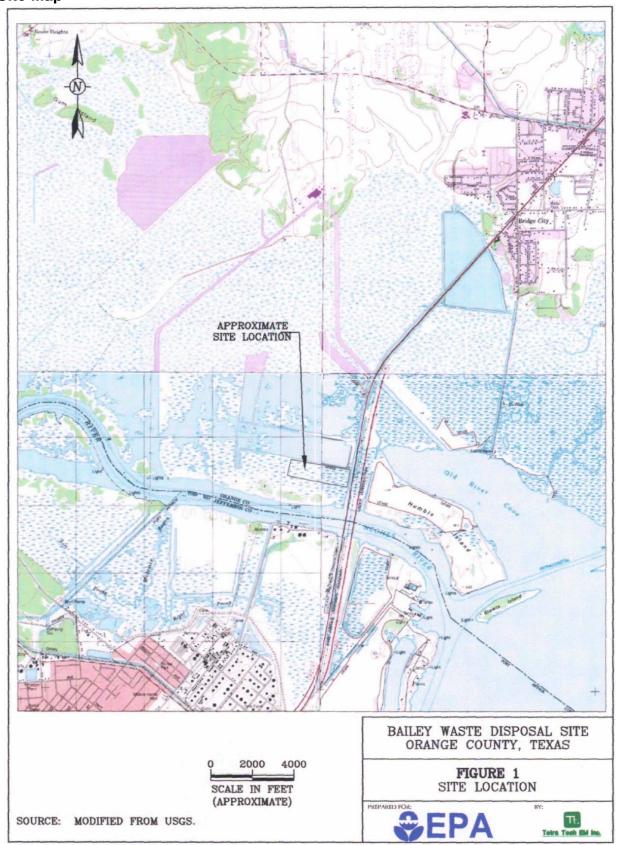
River and Sabine Lake join together.

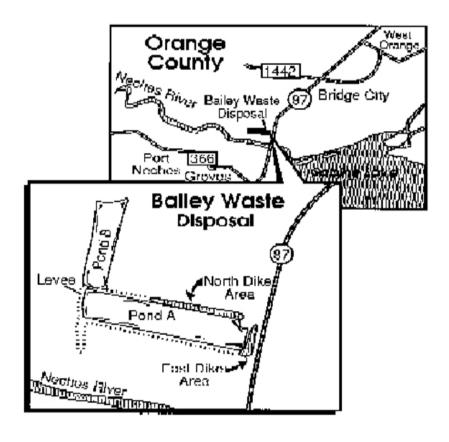
Population: Approximately 7,600 people within three miles of the site use wells for drinking water.

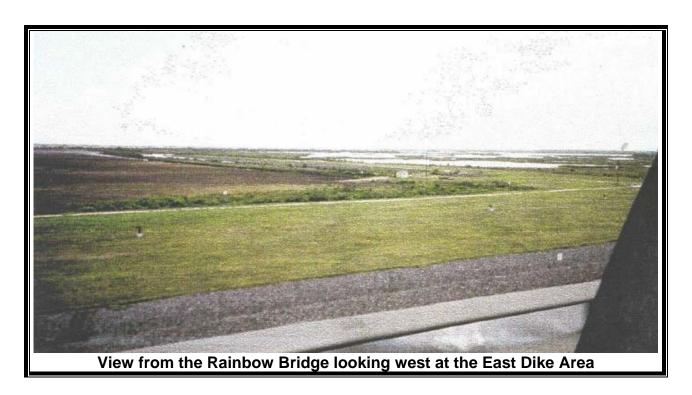
Setting: The site is located in a marsh area. The two capped waste areas occupy approximately

ten acres.

Site Map-







Wastes And Volumes -

The principal pollutants at the Bailey Waste Disposal site are metals, arsenic compounds, benzene, phenols, pyridines, naphthalenes, and chlorinated hydrocarbons in soil. Waste volume is approximately 156,000 cubic yards.

Health Considerations —

Analysis conducted by the State revealed chloroform, phthalates, trichloroethylene, and other compounds in surface water, ground water, and soils on site. The most significant risks to human health and the environment included the following:

- Direct contact many of the organic compounds and heavy metals found on the site have been
 determined to be carcinogens (i.e., can cause cancer). Absorption through the skin or other
 routes of inadvertent ingestion posed potential health risks.
- Surface waters Marsh was directly impacted from the site wastes, which had migrated into it, including organic compounds and heavy metals. Site waste has been removed from the marsh.
- Ground water shallow ground water directly beneath the waste was contaminated organic compounds and heavy metals.

Record of Decision (ROD) -

Original ROD signed June 28, 1988

Explanation of Significant Differences – North Marsh February 8, 1996

Explanation of Significant Differences – Pit B May 1, 1996

> Record of Decision Amendment December 16, 1996

In June 1998, the EPA selected a remedy consisting of the following components:

- Consolidation of affected sediments from the marsh, drainage channel, drum disposal, and Pit A-3 sectors in to the Waste Channel (North Dike Area) sector;
- In place stabilization of the waste in the Waste Channel sector and the sector East of Pond A (East Dike Area), and
- Construction of a cover on top of the stabilized waste.

After numerous in-place stabilization attempts, subsequent investigations, and a stabilization field pilot study, it was determined that the waste stabilization performance standards established in the ROD, and the remedial design would, if possible at all, be significantly more difficult, more time-consuming, and more costly to implement than was contemplated at the time the original ROD was issued. Due to these difficulties, implementation of the original ROD was not completed. The following components, however, were accomplished during the implementation of the original remedy:

- Waste/soil interface evaluation;
- Consolidation and relocation of shallow wastes within the East Dike Area;
- Construction of clay dikes around the East Dike Area;

- Construction of access roads and support lay down area;
- Stabilization of approximately one-third of the East Dike Area on the southern end;
- South drum disposal area remediation;
- Closure of wells and piezometers;
- Construction of a wastewater treatment plant to treat potentially contaminated water generated during the construction operations, including decontamination water, storm water from active areas, and ground water from dewatering operations; and
- Air monitoring to ensure action levels on site was not exceeded.

The interim remedial actions taken at the site are discussed in the Explanation of Significant Differences (ESD) dated February 8, 1996, and another ESD dated May 1, 1996. The following activities were accomplished during the interim remedial activities:

- Excavation of waste and affected sediments from the North Marsh Area and Pit B and transportation of this material to an off-site industrial landfill for solidification and disposal;
- Excavation and on-site relocation of waste and affected sediments from Pits A-1, A-2, and A-3;
- Verification (to a visually clean performance standard) that waste and affected sediments from the drainage channel and the south drum disposal area are removed during the original remedy;
- Waste and affected sediment relocation from the drum disposal area located on the North Dike Area to the East Dike Area;
- Placement of interim soil cover over the south portion of the East Dike Area, which had waste material exposed (active area);
- Closure of an existing on-site water supply well; and
- Air monitoring during intrusive activities to ensure action levels was not exceeded.

The ROD was amended in December 1996 and replaced the in-place stabilization component of the original remedy with lightweight composite caps over the North Dike and East Dike areas of the site. Major activities performed during the revised remedial action are summarized below:

- Relocation and consolidation of surface waste from the south end of the North Dike Area to a location within the limits of the area to be capped:
- Relocation and consolidation of bulk waste from the area adjacent to the former Pit B area to a location within the limits of the area to be capped;
- Installation of a water collection system to intercept and remove ground water that was elevated in the short term (i.e., during construction of the cap) due to consolidation of the waste (this water was taken on-site for disposal);
- Construction of a lightweight cap over the East and North Dike Areas;
- Installation of storm water management controls to route storm water runoff from disturbed areas during construction to the treatment system, and divert storm water runoff from inactive or completed areas of the site away from the active areas of the site.
- Construction of maintenance roads;
- · Air monitoring during intrusive activities to ensure action levels on site were not exceeded; and
- Installation of a passive gas venting system on both the North and East Dike Areas.

Site Contacts -

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